

ADMINISTRATIVE PROCEDURE

Student Behavior Threat Assessment Process

2952

Procedure No.

January 18, 2023

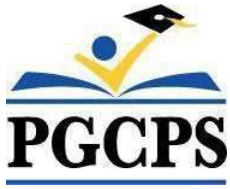
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- I. **PURPOSE:** The purpose of this procedure is to establish a threat assessment process that provides preventive and intervention measures for students whose behaviors pose a threat to the safety of the school environment. Addressing the safety and mental health needs of all parties involved in this process is a top priority.
- II. **POLICY:** The Board of Education is committed to providing safe and supportive learning and working environments for students and staff. To that end, the Board of Education directs the Chief Executive Officer to establish and maintain a behavior threat assessment process that provides appropriate measures to identify, assess, and intervene when an individual's behavior may pose a threat to the safety of the school, students in the school, and staff members in the workplace; to protect and support potential victims; and to provide assistance, as needed, to the individual being assessed. (Policy 2952)
- III. **BACKGROUND:** In accordance with §7-1507(c) of the Education Article, Annotated Code of Maryland, each local school system is required to adopt a model policy, consistent with the Subcabinet of the Maryland Center for School Safety's (MCSS) *Model Policy for Behavior Threat Assessment (MMP)*¹, for the establishment of behavior threat assessment teams whose functions include (but are not limited to), the development of a process for regular assessment and intervention, including mechanisms for identifying, assessing, and intervening with individuals whose behavior may pose a threat to the safety of the school or to an individual attending or working in a public school.

Prince George's County Public Schools (PGCPS) is working in partnership with the mental health community and law enforcement to ensure that mental health services and other resources are readily available to identify and eliminate threats or unwanted behaviors within the school community, to support potential victim(s), and provide assistance to the individual being assessed. Maintaining a safe and supportive learning environment is vital for achieving our goal of outstanding academic achievement for all students.

- IV. **DEFINITIONS:**
 - A. **Behavior Threat Assessment:** Behavioral threat assessment is a comprehensive structured group process used to identify, assess and manage the risk of threats of targeted violence posed by an individual or group.
 - B. **Mental Health Services Coordinator** - Prince George's County Public Schools (PGCPS) has designated a districtwide Mental Health Services Coordinator to serve the school system who is responsible for:

¹ Any requirements from the Maryland Model Policy are designated herein as "MMP".



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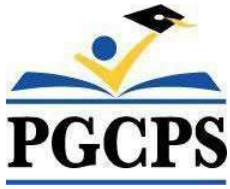
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- Coordinating existing mental health services and referral procedures for mental health services;
 - Working in collaboration with the Prince George’s County Department of Health and Human Services (DHHS), and other local providers of mental health services to refer students for treatment;
 - Coordinating with DHHS and other agencies and organizations to identify and advocate for external funding for mental health and wraparound services; and
 - Providing support to schools for coordination and delivery, as appropriate, of behavioral health and wraparound services to students exhibiting behaviors of concern.
- C. **Non-affiliated Person:** A non-affiliated person is a person who is not an employee, student, contractor, family member or friend of a student or staff.
- D. **Threat:** A threat is an expression of an intent to cause physical harm to someone. The threat may be expressed/communicated behaviorally, orally, visually, in writing, electronically, or through any other means; and is considered a threat regardless of whether it is observed by or communicated directly to the target of the threat or observed by or communicated to a third party; and regardless of whether the target of the threat is aware of the threat. Threats may be direct (“I am going to beat you up.”), indirect (“I’m going to get him.”) or conditional (“Give me your money or you will regret it.”).
- E. **Threat Levels**
1. **Low Risk Threat:** A low risk threat is one in which it is determined that the individual/situation does not appear to pose a threat of serious harm to self/others, and any exhibited issues/concerns can be resolved easily.
 2. **Moderate Risk Threat:** A moderate risk threat is one in which the person/situation does not appear to pose a threat of serious harm to self/other, at this time, but exhibits behaviors that indicate a continuing intent and potential for future violence or serious harm to self/others; and/or exhibits other concerning behavior that requires intervention.
 3. **High Risk Threat:** A high risk threat is one in which the person/situation appears to pose a threat of serious harm to self or others, exhibiting behaviors that indicate both a continuing intent to harm and efforts to acquire the capacity to carry out the plan; and may also exhibit other concerning behavior that requires intervention.



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4. **Imminent Risk Threat:** An imminent threat exists when the person/situation appears to pose a clear and immediate threat of serious violence toward self or others that requires containment and action to protect identified or identifiable target(s); and may also exhibit other concerning behaviors that requires intervention.

V. PROCEDURES:

A. Behavior Threat Assessment Teams

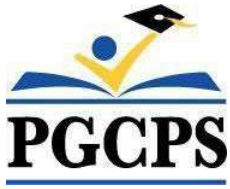
1. System-level Behavior Threat Assessment Oversight Team

a. The Chief Executive Officer (CEO) shall establish a system-level Behavior Threat Assessment Oversight Team to oversee and provide support for school-based behavior threat assessment teams. The System-level Behavior Threat Assessment Team shall consist of the following individuals:

- Mental Health Services Coordinator;
- Director/Designee of Student Services;
- Director/Designee of Safety and Security Services;
- Director /Designee of Special Education;
- Representative from School Support and Leadership;
- Representative from the Employee Labor Relations Office (ELRO);
- Representative from the Office of the General Counsel, and
- Other PGCPS staff as needed.

b. Responsibilities of the System-level Behavior Threat Assessment Oversight Team include:

- Analyze threat data collected to identify underlying systemic causes that may contribute not just to a given case, but perhaps to a range of cases over time.
- Provide support to and oversight of the school level threat assessment teams, which in some cases may include reviewing and changing the threat level determined by the school team;
- Maintain processes for effective information sharing between the school system and community mental health and law



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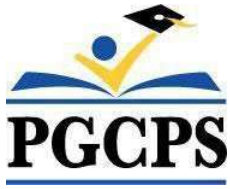
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enforcement agencies;

- Assess the effectiveness of the threat assessment process throughout the school system;
- Recommend changes to policies and procedures to maintain an effective threat assessment process reflecting known best practices at the universal level and other tiers of intervention;
- Be knowledgeable of current trends regarding school safety and social media applications; and
- Conduct behavior threat assessments of alleged threats posed by students, if the School-Based Behavior Threat Assessment Team members are not trained and in situations where any individuals who are not PGCPS students (including staff, parents, contractors, volunteers, and non-affiliated persons) are alleged to have posed a threat. (MMP)

2. School-based Behavior Threat Assessment Team

- a. Each school shall establish a Behavior Threat Assessment Team to monitor and respond to information about behavior, statements, or plans that pose a threat of violence at a school or a school function. This team includes the following individuals:
- Principal or designee who is a building administrator;
 - School mental health provider(s) such as: professional school counselor, school psychologist, social worker;
 - School Resource Officer (SRO) or other law enforcement representative;
 - Safety and Security Services personnel, such as the Lead Investigator Counselor (Sgt.) or Investigator Counselor (IC) who are assigned to the school, or Safety and Security Services personnel who conduct special investigations;
 - A representative with expertise in special education and familiarity with the student's Individualized Education Plan (IEP) when faced with a threat made by, or directed towards, a student(s) receiving special education services or is/are in the special education assessment process;



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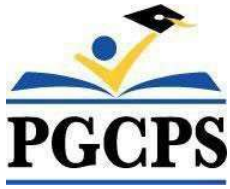
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- The student’s counselor or Section 504 Coordinator/Case Manager, when the threat is made by, or directed towards a student with a Section 504 plan;
 - A staff member with English Language Learner (ELL) training when the threat is made by or directed towards a student who receives ELL/ESOL services; and
 - Other school staff or community resources (as determined by the above members).
- b. Each assessment team shall:
- Provide guidance to students and staff regarding recognition of threatening behavior that may represent a threat to the community, school or self;
 - Identify members of the school community to whom threatening behavior should be reported; and
 - Implement the local school system’s procedure for the assessment of and intervention with individuals whose behavior poses a threat to the safety of school staff or students. (MMP)
- c. The principal/designee is the team leader for the School-based Behavior Threat Assessment Team.
- d. The team members shall work collaboratively with each other, with other school staff, and as appropriate, with community resources to support the purposes of the School-based Behavior Threat Assessment Team and the safety of the school, its students and its staff.
- e. Upon preliminary determination that a student poses a threat of violence or physical harm, the School-based Behavior Threat Assessment Team shall immediately report its determination to the Chief Executive Officer (CEO) or designee.
- f. The principal or designee shall consult with the System-level Behavior Threat Assessment Team as needed and appropriate.
- g. The School-based Behavior Threat Assessment Team must meet at least monthly to review active cases. If there are no active cases, the team does not need to meet monthly. Cases reviewed by this



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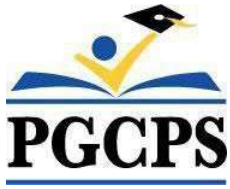
team should be classified as:

- (1) Currently active and under review;
- (2) Active with proactive monitoring of behavior; or
- (3) Inactive with reactive monitoring, as needed. (MMP)

- h. The School-based Behavior Threat Assessment Team does not conduct discipline related investigations.
- i. When a student transfers the sending school's team must notify the receiving school that a behavior threat assessment was conducted in the past.

B. Behavior Threat Assessment Team Trainings

1. All School-based Behavior Threat Assessment Team members should be trained to:
 - a. Effectively triage cases and provide case management, which includes, but is not limited to:
 - Determining and documenting interventions;
 - Making referrals to outside agencies;
 - Providing supports to all students and staff involved; and/or
 - Managing any school environmental and climate factors.
 - b. Conduct interviews and file reviews as part of the behavior threat assessment process.
 - c. Understand implicit bias and promote disability and diversity awareness with specific attention to racial and ethnic disparities.
 - d. Analyze concerning behaviors to make a determination of the seriousness of the threat.
 - e. Analyze information gathered from the assessment to develop an individualized case management plan.
 - f. Adhere to student privacy and non-disclosure requirements including the Family Educational Rights and Privacy Act (FERPA).



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- g. Understand the strategies and guidelines set forth in the *MCSS Model Policy for Behavior Threat Assessment*. (MMP)

2. Staff and Student Training

The School-Based Behavior Threat Assessment Team must provide guidance to students and staff regarding recognition of potentially threatening behavior and processes for reporting threatening behavior by conducting presentations, broadly disseminating relevant information and ensuring access to consultation from the School-Based Behavior Threat Assessment Team.

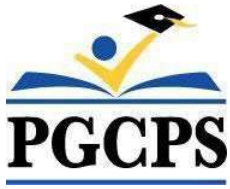
- C. **Threat Assessment and Management Process**

1. **Identifying and Reporting Threats**

- a. Nothing in this procedure shall preclude PGCPS staff from acting immediately to address an imminent threat to life and safety. (MMP)
- b. All PGCPS employees, volunteers, contractors, students and parents shall report immediately to the principal or supervisor (or designee), or PGCPS staff member any student's, concerning communications, or concerning behaviors that suggest an individual may intend to commit an act of violence. Staff who receives such reports shall immediately convey the information to the principal/designee or appropriate supervisor. (MMP)
- c. Students, employees, parents or guardians, volunteers, contractors, and community members may also anonymously report potential threats to the **Safe Schools Maryland Tip Line at 833-MD-B-SAFE (833-632-7233) or via the Safe Schools MD app.**

All schools and PGCPS facilities shall display posters with the Safe Schools Maryland contact information in or near the front office and multiple locations throughout the school or facility and share written and on-line resources with their parents and school community.

2. **Obtaining Information about the Incident**



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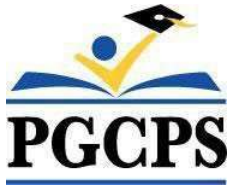
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- a. The principal/supervisor (or designee) is required to conduct an initial inquiry about the incident as expeditiously as possible using Attachment C.
 - b. Based on the information obtained in the initial inquiry the principal/supervisor/(or designee) will notify one or more school mental health providers (e.g., school counselor, school psychologist, social worker) and, as needed, Safety and Security Services personnel to make a determination about the need to proceed with the next steps in the behavior threat assessment process.
3. **Imminent Risk Threat by Students, Employees, Volunteers, Contractors, Parents or Unaffiliated Individuals**
- a. If the student appears to pose an imminent threat of serious violence to themselves or to others in the school, the principal is required to call 911 immediately, and then provide notification to the Department of Safety and Security Services. Principals are also required to notify their Instructional Directors.
 - b. In accordance with the Maryland State Department of Education’s “Emergency Planning Guidelines for Local School Systems and Schools” (October 2017), school responses may include actions such as evacuation, lockdown and shelter-in-place.
 - c. Within 24 hours of a determination, the School-based Threat Assessment Team leader (principal/designee) is required to adequately document the incident and upload the documentation into the electronic Behavior Threat Assessment Tracking System (BTATS).

4. **Assessing the Threat**

If there is no imminent threat present, or once such an imminent threat is contained, the threat assessment process shall continue and documented using Attachment B.

The triage process may include, as necessary and appropriate, interviews, record reviews, and law enforcement, although their involvement is not always needed, especially when the team is able to determine with a



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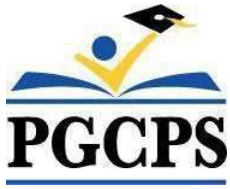
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reasonable degree of confidence that the alleged threat is not a threat or is a low risk threat. The triage process may include:

- a. Reviewing the initial inquiry report and any additional information about the threatening behavior or communication;
- b. Reviewing educational and health records. This includes recent school performance history, disciplinary actions, prior threats, previous social and emotional interventions, presence of known problems in the life of the individual, and online searches. The review is conducted by the school counselor, school psychologist and/or school social worker;
- c. Consulting with staff members who know the student well;
- d. Requesting the law enforcement member/Security Services member of the School-Based Behavior Threat Assessment Team to obtain criminal history record information to further evaluate and assess the threat, where deemed appropriate; (MMP)
- e. Conducting timely and thorough interviews, as necessary, of the person(s) who reported the threat, the recipient(s) or target(s) of the threat, other witnesses who have knowledge of the threat, and where reasonable, the individual(s) who allegedly engaged in the threatening behavior or communication. Interviews are conducted by the school counselor, school psychologist and/or school social worker (see Attachment A);
- f. Using additional information gathering techniques to identify a student's social media accounts, internet activity, calls for service, and other information or data that supports the School-based Behavior Threat Assessment Team's review.

5. Determine the Threat Level

- a. Make a determination as a team, as expeditiously as possible, of the seriousness and validity of the threat and the degree to which existing resources and mechanisms are sufficient to address the concern.
- b. If it is determined that the threat is not identifiable or is a low threat of violence or harm to self or others, the School-based Behavior Threat Assessment Team may determine that no further assessment,



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intervention, or monitoring is required at the time to prevent violence. Nonetheless, the incident must be documented in Attachment B and in the online Behavior Threat Assessment Tracking System (BTATS).

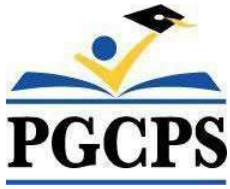
- c. If it is determined that the threat is a moderate or high risk of violence or harm to self or others, the school-based Behavior Threat Assessment Team must complete the student interview form (Attachment A) and the incident must be documented (Attachment B).
- d. The age, grade and mental capacity of the student will be taken into consideration in the determination of the level of threat and in the decision to involve law enforcement.
- e. If the team is unable to come to a consensus about the threat level, the principal makes the final decision.

6. **Responding to a Threat by a Student**

- a. After the school-based Behavior Threat Assessment Team determines the level of threat, the following actions are required as appropriate:
 - 1) Within 24 hours of a determination, the School-based Threat Assessment Team leader (principal/supervisor/designee) is required to adequately document the behavior threat assessment process on Attachment B.
 - 2) The School-Based Threat Assessment Team leader (principal/supervisor/designee) must place originals of all information gathered into the student's Limited Access File (LAF), and the copies will be uploaded into the on-line Behavior Threat Assessment Tracking System (BTATS).

7. **Student Records and Confidentiality**

Upon preliminary determination by the threat assessment team that a student poses a threat of violence to self and/or to others in the school or school building or at a school sponsored event, the law enforcement member of the School-Based Behavior Threat Assessment Team may request and obtain criminal history record information to further evaluate and assess the situation, where deemed appropriate. (MMP)



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- a. No member of the School-Based Behavior Threat Assessment Team shall re-disclose any criminal history record information obtained pursuant to the threat assessment or otherwise use any record of an individual beyond the purpose for which such disclosure was made to the School-Based Behavior Threat Assessment Team in order to carry out its prescribed activities.(MMP)
- b. The School-Based Behavior Threat Assessment Team may not maintain an individual’s criminal history record obtained to carry out its functions, nor may Team members make copies of it. (MMP)
- c. Criminal history information obtained under the behavior threat assessment process may not be placed in the student’s LAF or otherwise maintained as a student education record. (MMP)
- d. All members of the School-Based Behavior Threat Assessment Team who are not PGCPS staff, i.e. SRO, etc. are required to sign a confidentiality and non-disclosure statement limiting re-disclosure of student records. (MMP)

8. Parent/Guardian Notification

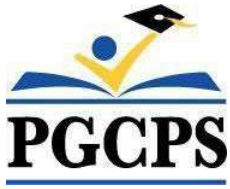
a. Unsubstantiated - Low Risk Student Threats

In cases involving unsubstantiated or low risk threats, the principal may notify the parent or guardian of any student who is the target/recipient of a threat and is required to notify the parent or guardian of any student who posed a threat. (MMP)

b. Moderate/High/Imminent Risk Student Threats

1) In instances where the threat is deemed moderate risk, high or imminent risk, or requires further intervention to prevent violence or serious harm, the principal is required to notify the parent or guardian of any student who is the target/recipient of a threat as well as the parent or guardian of any student who made the threat. (MMP)

2) The principal shall immediately report any act noted above that may constitute a criminal offense to the parents and/or guardians of



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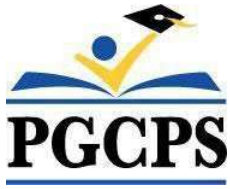
any minor student who is alleged to have committed the act and shall report that the incident has been reported to local law enforcement. (MMP)

- 3) The principal shall inform the parents and/or guardians that they may contact local law enforcement for further information, if they so desire. (MMP)
- 4) When it is necessary to arrest the student making the threat on school premises during school hours, the principal shall ascertain: the facts from the arresting officer, which will enable him/her to fully advise the parent or guardian and other appropriate school officials of the nature of the charge; the identity of the arresting officer; and the location to which the student is being taken. (MMP)
- 5) If the parent or guardian refuses to follow the safety recommendations for the student or does not take the suicide risk seriously, the principal/designee may contact Child Protective Services at (301) 909-2450 or (301) 699-8605 to report suspected child neglect. (MMP)
- 6) The principal/designee must document the date and time of phone calls and meetings with parents and guardians regarding suspected threats. (MMP)

D. Intervening, Monitoring and Resolving Student Threats

As part of the behavior threat assessment process, the School-Based Behavior Threat Assessment Team, with consultation from the Mental Health Services Coordinator, will identify available resources (including law enforcement and other public safety agencies) and community support organizations to assist, as appropriate, in developing and implementing a case management plan for the student of concern and any potential victims. (MMP)

1. The Case Management Plan should be fact-based and person/situation specific. The plan should identify appropriate actions to implement with the student who posed a threat. Examples of such actions may include, but are not limited to: providing direct communication and engagement with the individual who was assessed to build rapport and relationship, decrease isolation, de-escalate volatile reactions, provide feedback and mentoring; monitoring reactions to grievances, interventions, and precipitating events; making referrals to the SIT/SSP/IEP team for



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assistance and support services, including but not limited to: academic assistance or accommodations, social skills training, restorative approaches including peer mediation, restorative chats, etc.; providing peer coaching/mentoring; providing school-based counseling services; and/or providing individual counseling referrals for outpatient counseling/mental health care.

Updates regarding the case are to be documented and uploaded in the online Behavior Threat Assessment Tracking System (BTATS) regularly by the designated case manager, at least every 30 days, until the case is resolved and the student is no longer assessed to pose a threat to the school or its staff or students.

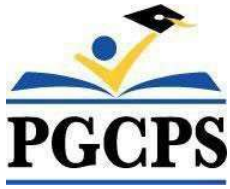
2. The School-Based Behavior Threat Assessment Team may inform potential victim(s) of the threat. The Case Management Plan will identify actions that will support potential victim(s) of the threat or students impacted by the threat. Examples of such actions may include, but are not limited to: offering brief supportive counseling; school based staff to monitor student who was the victim at regular intervals, etc.

E. Student Discipline

1. Regardless of threat assessment activities, disciplinary action should be taken in accordance with the PGCPS Student's Rights and Responsibilities Handbook. How suspension or expulsion from school might affect the Team's ability to monitor the student should be considered when making a decision about the appropriate disciplinary level. Removing a student from school does not eliminate the risk to the school community or the need to develop a case management plan to support the student, as appropriate. (MMP)
2. If a student must be suspended or expelled, the School-Based Behavior Threat Assessment Team should develop strategies to stay connected to the student's family and the student, to determine whether the student's situation is deteriorating or the behaviors of concern are escalating so that they can respond. (MMP)

F. Communication with Media and the Community

The school principal or designee should coordinate with the Area Office, Security Services (301-449-7000), and/or the Office of Communications (301-952-6001) for the release of any information. **No one should speak with the press without**



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approval from the Office of Communications.

VI. MONITORING AND COMPLIANCE:

- A. Principals will maintain a list of team members and a record of the training team members, staff and students have received annually.
- B. Principals will be responsible for ensuring that information about threats occurring in their buildings are entered into the Behavior Threat Assessment Tracking System (BTATS) 24 hours following an incident. The Department of Student Services will randomly audit the BTATS to ensure that schools have entered information about all threats occurring in their school.
- C. Case Management Plans will be monitored on a monthly basis by the mental health providers on the team. The Department of Student Services will randomly audit Case Management Plans to ensure consistent follow-through with students who made a threat and/or students who were the subject of a threat.
- D. The Department of Safety and Security Services will randomly check schools throughout the school year to ensure that all schools and PGCPS facilities have displayed posters with the MCSS School Safety Tip Line contact information in multiple locations and share written and electronic resources with their parents and school community.

VII. RELATED PROCEDURES

Administrative Procedure 2950:

Crisis Intervention at the School in Response to Suicide, Death, and Related Traumas;

Administrative Procedure 3524:

Emergency Communications System;

Administrative Procedure 3541.35:

Evacuation of School Buses;

Administrative Procedure 4156:

Administrative Leave or Temporary Placement of Employees;

Administrative Procedure 5062:

Student Behavior Interventions;

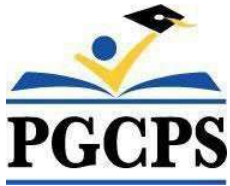
Administrative Procedure 5124:

Student Intervention Team and Student Support Team;

Administrative Procedure 5125:

Individual Student School-Based Records;

Administrative Procedure 5144:



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Cooperation with Law Enforcement Officers and Government Officials
Contacting Students;
Administrative Procedure 5145:
Reporting Suspected Child Abuse and Neglect;
Administrative Procedure 10201:
Disruptive Acts Requiring Security Measures; and
Administrative Procedure 10101:
Student Rights and Responsibilities Handbook

VIII. **LEGAL REFERENCE:**

Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. §1232g, 34 CFR Part 99;
Protection of Pupil Rights Amendment (PPRA), 20 U.S.C. §1232h, 34 CFR Part 98;
Individuals with Disabilities Education Act (IDEA), 20 U.S.C. §1400;
Annotated Code of Maryland, Education Article, §4-131;
Maryland Safe to Learn Act, Annotated Code of Maryland, Education Article, §7-1501 *et seq.*;
COMAR 13A.01.04.03; COMAR 13A.08.03.06; COMAR 13A.08.01.11;
COMAR 13A.08.01.12-1.

IX. **MAINTENANCE AND UPDATE OF THESE PROCEDURES:** These procedures originate with the Department of Student Services and will be reviewed on an annual basis and updated as required.

X. **CANCELLATIONS AND SUPERSEDURES:** This procedure cancels and supersedes the version dated August 1, 2020.

XI. **EFFECTIVE DATE:** January 18, 2023

XII. **Attachment(s):**

Attachment A: Student Interview Questions
Attachment B: Student Threat Assessment and Response Form
Attachment C: Response, Management and Support Plan
Attachment D: Employee Observed Behavior Checklist